REMARKS

The application has been amended and is believed to be in condition for allowance.

Claims 13, 15-21, and 24 have been amended, the amendments finding support in the specification and the figures and not introducing new matter. Claims 14, 22 and 23 have been canceled without prejudice. New claims 25-31 find support in the specification and the figures and introduce no new matter.

The Official Action objected to the abstract of the disclosure stating that the abstract does not commence on a separate sheet in accordance with 37 CFR 1.52(b)(4).

In response, the specification is amended with a new abstract to obviate the Official Action's objection.

The Official Action rejected claims 13-24 under 35 U.S.C. 103(a) as being unpatentable over of Davis (US 2002/0130900 Al, hereinafter DAVIS) in view of Sanderson (WO 02/44897 Al, hereinafter SANDERSON).

In response, it is first noted that the recitation of claim 14 has been incorporated into independent claim 13, and claim 14 cancelled as noted above. Claims 22 and 23 have been similarly incorporated into independent claim 21.

It is also noted that the Official Action fails to identify with specificity the elements in DAVIS purportedly corresponding to the construction elements, e.g. the

visualization model objects, the presentation layer, and the logical rules.

In addition, claim 13 has been amended to recite the logical rules applied at the client terminal to the visualization model by a rule engine, providing event-operated interface controls in the visualization model and script code to manage the event-operated interface controls. The amendment finds support in the specification, e.g. page 9, lines 10-17, and page 11, lines 21-34.

The Official Action states that DAVIS discloses the claimed aspect of construction elements including a descriptive interface of the visualization model objects, a presentation layer and some logical rules to be applied locally to the visualization model.

It is respectfully submitted that neither DAVIS nor SANDERSON, individually or in combination, describe or suggest the incorporation of script code to manage event-operated interface controls with the visualization model, as required by claim 13, as amended. Nor does DAVIS or SANDERSON, individually or in combination, describe or suggest a rules engine to apply the script code to the visualization model as required by claim 13.

On the contrary, DAVIS describes a system wherein an XML stream includes information about widgets required by the published application, so that the client computer can provide

compatible widgets from its native interface toolkit (paragraph [0030]). Whenever the user initiates an event while accessing an application and clicking on a button or pressing "enter," for example, the viewer sends the event to the projector to handle the event and direct the viewer how to respond (paragraph [0031]). That is, DAVIS describes standalone viewer distinct from a navigator or web browser capable of employing scripts.

Moreover, DAVIS teaches away from the use of scripts and a script-compatible web browser as the viewer on the client terminal. "[It] takes less time for developers to create software applications in accordance with the present invention because they do not have to bother with entering data into web pages in HTML, JavaScript, VBScript, ASP, Java, etc." (paragraph [0032]).

Similarly, SANDERSON teaches away from the use of script languages, disclosing "the declarative UI generator does not require the extensive programming typically associated with scripts and applets," (page 3, lines 23-24). SANDERSON discloses the use of a web browser by way of either a plug-in or a network distributable applet (page 8, lines 17-19), but also teaches an alternative embodiment where no web browser is required. While SANDERSON teaches an embodiment where the UI generator is an Java applet running within a browser (page 12 line 21 to page 13 line 6), it is noted that

Java, requiring compilation into machine code or byte-code to execute within a Java Virtual Machine, is not a scripting language to manage UI events in a browser, e.g. Javascript.

The Official Action also states that DAVIS does not teach the claimed aspect of data to be displayed are merged with the visualization model in order to display merging result, but SANDERSON discloses this aspect, wherein UI generator communicates with databases and initiates a user interlace. The Official Action states that SANDERSON illustrates the aspect of displayed and merged data on the interface in Figure 1, element 104A.

In response, it is noted that claim 13 has been amended to recite display data of the response are merged, at the client terminal, with the visualization model and displayed as a merged result. The amendment finds support in the specification and the figures (e.g., Figure 3 and page 8, lines 29-30). It is respectfully submitted that neither DAVIS nor SANDERSON, individually or in combination, teach or suggest a merging step as required by claim 13 as amended.

On the contrary, element 104A of Figure 1 illustrates some information labeled data1 through data3 in the declarative user interface of the SANDERSON. The Official Action does not state with specificity any method that merges any data provided by a server part with a visualization model created at a client terminal.

SANDERSON teaches a context element, 107A, and a content object, 107B stored and retrieved from the server (page 11, lines 7-25). SANDERSON discloses context 107A as contextual information relating to data to be displayed by the UI generator 103 (page 11, lines 7-8), while content 107B is described as an abstraction that allows various representations of data and data streams to be communicated between the generator 103 and the content server 106 (page 12, lines 2-4).

SANDERSON provides no teaching that the 107A and 107B are <u>merged</u>. However, SANDERSON suggests in Figure 1 that 107A and 107B are merged <u>at the level of the server 106</u>. This disclosure teaches against the claimed method of merging the display data of the server response with the visualization model at the client terminal.

Accordingly, it is submitted that SANDERSON does not teach or suggest merging the display data with the visualization model as required in claim 13.

For all the foregoing, it is respectfully submitted that claim 13 is not rendered obvious under DAVIS in view of SANDERSON. Reconsideration and withdrawal of the rejection are respectfully requested.

As to claim 15, the Official Action states that SANDERSON, achieves the claimed aspect of language resources locally available or downloadable from the server part, one is

associated to the created visualization model, wherein in Fig. 1 the declarative User Interface is displayed in that associated language. The Official Action does not identify with specificity the element in DAVIS or SANDERSON purportedly corresponding to the language resources.

In response, it is noted that claim 15 has been amended to recite associating a language resource from a plurality of language resources to the visualization model, the plurality of language resources stored at the client terminal, to adapt the visualization model to a predetermined language, a designation of the predetermined language to be associated to the visualization model provided in the instruction data from the server part. The amendment finds support in the specification, e.g. page 10 line 33 to page 11 line 5.

It is respectfully submitted that neither DAVIS nor SANDERSON, individually or in combination, describe or suggest associating a language resource from a plurality of language resources, nor providing a designation of the predetermined language with the instruction data provided by the server part, as required by claim 15 as amended.

On the contrary, neither DAVIS nor SANDERSON describe or suggest any mechanism or resource related to a plurality of language resources, stored at the client terminal or elsewhere.

Therefore, it is respectfully submitted that claim 15 is not rendered obvious under DAVIS over SANDERSON. Reconsideration and withdrawal of the rejection are respectfully requested.

As to claim 16, the Official Action states that DAVIS achieves the aspect of some personalization display filters are associated to the visualization model in order to modify the visual rendering of the default visualization model at the level of the client terminal, wherein projector 100 transmits XML stream of interlace component of software application to viewer 200 and viewer 200 has information about what each widget needed.

The Official Action further states that SANDERSON discloses the claimed aspect of some personalization display filters wherein the configuration data and context file is parsed in Fig. 4B, step 428 to obtain the workflow description and content specification.

It is respectfully submitted that neither DAVIS nor SANDERSON, individually or in combination, describe or suggest associating personalization display filters at the client terminal to the visualization model in order to modify a visual rendering of the visualization model according to specific client parameters, as required by claim 16 (as amended).

On the contrary, DAVIS provides no teaching or suggestion of either specific client parameters or a step of associating personalization display filters to a visualization model to modify the visual rendering of the visualization model. That is, the visualization model is created by the construction elements, as recited in claim 13. Claim 16 recites the modification of the visual rendering of the visualization model so created, according to client parameters not recited in the creation of the visualization model. Davis does not teach this additional step of modifying the visual model already created by the elements in claim 13.

particularly web site developers, need only provide a content specification to the declarative UI generator 103 specifying the type of data to be displayed in the dynamically generated UI and the tasks with which the data can be accessed and manipulated (page 13, lines 18-24). SANDERSON provides no teaching or suggestion that a user, as opposed to a developer, can modify a visual appearance of the dynamically generated UI.

SANDERSON teaches that personal information, such as credit card data, may be stored on the client-side file system (page 13, lines 2-5). SANDERSON does not, however, teach or suggest, however, any preferences modifying the visual rendering of the visualization model, as required by claim 16.

Therefore, it is respectfully submitted that claim 16 is not rendered obvious under DAVIS in view of SANDERSON. Reconsideration and withdrawal of the rejection are respectfully requested.

For all the foregoing, it is respectfully submitted that claim 13 and claims depending therefrom are patentable.

Claims 21, 23, and 24, as amended, are believed patentable for the same reasons stated above.

New claims 25 and 26 depend from independent claim 13 and find support in the specification (e.g., page 8, lines 30-32; page 9, lines 10-17) and introduce no new matter. It is respectfully submitted that new claims 26 25 and patentable over DAVIS in view of SANDERSON. As to claim 25, neither DAVIS nor SANDERSON, individually or in combination, describe or suggest script code provided in the Javascript scripting language. As to claim 26, neither DAVIS SANDERSON, individually or in combination, describe or suggest a visualization model comprising images, script code, markups, the script code being in the Javascript scripting language and the markups being in Hypertext Markup Language (HTML).

New claims 27-30 depend from independent claim 21, finding support in the specification and the figures and introduce no new matter. Claim 27-30 are believed to be patentable for the same reasons outlined above.

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New independent claim 31 is believed to be patentable for the same reasons aforementioned.

From the foregoing, it will be apparent that applicants have fully responded to the July 24, 2007 Official Action and that the claims as presented are patentable. In view of this, applicants respectfully request reconsideration of the claims, as presented, and their early passage to issue.

In order to expedite the prosecution of this case, it is requested that the Examiner telephone the attorney for applicants at the number set forth below if the Examiner is of the opinion that further discussion of this case would be helpful.

The Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 25-0120 for any additional fees required under 37 C.F.R. § 1.16 or under 37 C.F.R. § 1.17.

Respectfully submitted,

YOUNG & THOMPSON

Roland E. Long, Jr., Reg. No. 4

745 South 23rd Street Arlington, VA 22202 Telephone (703) 521-2297 Telefax (703) 685-0573

REL/mjr

APPENDIX:

The Appendix includes the following item(s):

igstyle - a new or amended Abstract of the Disclosure